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**BY ECF**

Honorable Vera M. Scanlon  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re:** *Rayne Valentine v. City of New York, et al.* - 21-CV-4867 (EK) (VMS)

Your Honor:

I am co-counsel for Plaintiff Rayne Valentine. I write jointly with Defendants to ask that, in the event the Court does not grant the parties' pending application (ECF 51) at least to the extent of adjourning the settlement conference scheduled for February 21, 2023, the Court adjourn today's deadline by which the parties must make their *ex parte* settlement submissions until Thursday, February 16, 2023. Given the circumstances outlined in the application, notwithstanding significant efforts, the parties are still in the process of preparing those submissions. There has been no prior application for such relief. (If the Court adjourns the settlement conference, of course, that will likely moot this application).

The parties thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver